



CENTER FOR FOOD SAFETY

Submitted via E-Mail and USPS on August 11, 2020

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Andrew Wheeler, EPA Administrator
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1200 Pennsylvania Avenue, N. W.
Mail Code: 1101A
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Via email: Wheeler.andrew@Epa.gov

Re: 2020 Re-registration of Dicamba New Use on Herbicide-Tolerant Soybeans and Cotton

Ms. Echeverria, Mr. Kenny, and Mr. Wheeler and other relevant and appropriate EPA staff:

Please accept the enclosed documents on behalf of the Center for Food Safety for the Environmental Protection Agency's (EPA) consideration in determining its next action(s) on the new uses of dicamba over the top of genetically engineered herbicide-tolerant soy and cotton, including, but not limited to, the formulation Xtendimax, EPA Reg. No. 524-617,¹ which EPA cancelled on June 8, 2020.² Based on public statements of both the agency and the registrants, the registrants have sought another registration, and EPA is currently considering those applications,

¹ Also including other products covered by any such registration action, including as Engenia, EPA Reg. No. 7969-345, FeXapan, EPA Reg. No. 352-913, and Tavium, EPA Reg. No. 100-1623.

² EPA, Final Cancellation Order for Three Dicamba Products,
https://www.epa.gov/sites/production/files/2020-06/documents/final_cancellation_order_for_three_dicamba_products.pdf.

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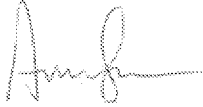
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with a determination to be made later this year. Accordingly, these materials are before the agency and should be considered by it in any such decision. The materials are timely and exceedingly relevant, as they include: scientific studies on volatility and other impacts; news articles covering the controversy and damage from dicamba drift; reports from state regulators and pesticide experts on 2019-2020 drift damage; and public filings and other documents filed in the existing dicamba drift damage litigation, including company statements and reports about their products and drift damage.

These materials are submitted via electronic mail (WeTransfer link) and through USPS, the enclosed thumb drive.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy van Saun', with a stylized, cursive script.

Amy van Saun
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